## **EXHIBIT B**



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## March 18, 2014

## Via Email

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Re: City of Detroit's Motion for Approval of Settlement and Plan Support Agreement (the "9019 Motion")

## Dear Counsel:

As you are aware, the Court has extended the deadline for depositions in connection with the 9019 Motion until March 31, 2014. The City's witnesses, Kevyn Orr and Gaurav Malhotra, will both be available for deposition on the afternoon of March 31 at our offices in Southfield. We'll revert to you as soon as possible with the precise times that each will be available.

We plan to produce to you, on or before March 26, the final execution draft of the swap settlement agreement, any exhibits that we plan to use in examining Mr. Malhotra at the hearing, and an updated version of the privilege log that was previously produced, reflecting emails and memoranda reviewed by Mr. Orr in connection with the settlement.

Kindly notify us by March 26 of any rebuttal witnesses you intend to call, as well as any exhibits you intend to use at the hearing.



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If you have any questions, please don't hesitate to call me.

Sincerely,

Deborah Kovsky-Apap

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